

RECEIVED

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

JUN 13 2008
JUN-3 2008
MICHAEL W. DOBINS
CLERK, U.S. DISTRICT COURT

BOBBY LEE HARRISON

(Enter above the full name
of the plaintiff or plaintiffs in
this action)

vs.

COUNTY OF COOK, ILLINOIS

THOMAS DART

CERMAK HEALTH SERVICES

ANN DUNLAP

CATOURE

John MUELLER

John DOE

(Enter above the full name of ALL
defendants in this action. Do not
use "et al.")

08CV 3202

JUDGE KENNELLY

MAGISTRATE JUDGE MASON

Case No: _____
(To be supplied by the Clerk of this Court)

CHECK ONE ONLY:

_____ COMPLAINT UNDER THE CIVIL RIGHTS ACT, TITLE 42 SECTION 1983
U.S. Code (state, county, or municipal defendants)

_____ COMPLAINT UNDER THE CONSTITUTION ("BIVENS" ACTION), TITLE
28 SECTION 1331 U.S. Code (federal defendants)

_____ OTHER (cite statute, if known)

**BEFORE FILLING OUT THIS COMPLAINT, PLEASE REFER TO "INSTRUCTIONS FOR
FILING." FOLLOW THESE INSTRUCTIONS CAREFULLY.**

Plaintiff:

A Name: BOBBY LEE HARRISONB. Date of Birth: December 26 1952C. List all aliases: ACED. Prisoner identification number: 20040572892E. Place of present Confinement: COOK COUNTY CorrectionsF. Address: 26 & California Ave Chicago Illinois 60608.

(If there is more than one plaintiff, then each plaintiff must list his or her name date of birth aliases, ID.

Number, place of confinement, and current address according to the above format on a separate sheet of paper)

Defendants:

(In A below, place the full name of the first defendant in the first blank, his or her official position in the second blank, and his or her place of employment in the third blank, space for six additional defendants is provided in B-G.)

A. Defendant: COUNTY OF COOK, ILLINOIS, and THOMAS DART, in his individual andTitle: Official Capacities as Sheriff of Cook County IllinoisPlace of Employment: COOK COUNTY DEPARTMENT OF CORRECTIONSB. Defendant: CATOURÉ, in her individual and official Capacities asTitle: MEDICAL DIRECTOR OF CERMAK HEALTH SERVICESPlace of Employment: COOK COUNTY DEPARTMENT OF CORRECTIONSC. Defendant: ANN DUNLAP, in her individual and official Capacities asTitle: HEAD DOCTOR OF THE DEVISON 10 DISPENSARYPlace of Employment: COOK COUNTY DEPARTMENT OF CORRECTIONSA. Defendant: JOHN MUELLER, in his individual and official Capacities asTitle: Supervisor of the PROGRAM SERVICESPlace of Employment: COOK COUNTY DEPARTMENT OF CORRECTIONSB. Defendant: JOHN DOE, in his individual and official Capacities asTitle: Ophthalmologist of CERMAK Health ServicesPlace of Employment: COOK COUNTY DEPARTMENT OF CORRECTIONSC. Defendant: CERMAK HEALTH SERVICES, in its individual and official Capacities asTitle: Hospital for Detainees,Place of Employment COOK COUNTY DEPARTMENT OF CORRECTIONS

1. List All lawsuits you (and your co-plaintiffs, if any) have filed in any state or federal court (including the Central and Southern Districts of Illinois):

A. Name of case and docket number: BOBBY LEE HARRISON
HORAN & HORAN Interprise 06C4730

B. Approximate date of filing lawsuit: August 31, 2006

C. List all plaintiffs (if you had co-plaintiffs), including any aliases: ACE
First & Only Bobby Lee Harrison

D. List all defendants: HORAN & HORAN

E. Court in which the Lawsuit was filed (if federal court, name the district; if state court, name the county): U.S. DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS

F. Name of judge to whom case was assigned: DER-YEGHAYAN

G. Basic claim made: _____

H. Disposition of this case (for example: was the case dismissed? was it appealed? Is it still pending?):

This case was dismissed, and was not appeal, due to being incarcerated

I. Approximate date of disposition: _____

A. Name of case and docket number: BOBBY LEE HARRISON V. COUNTY OF COOK, Illinois, and THOMAS DART, Case #. OTC 0300

B. Approximate date of filing lawsuit: January 17, 2007

C. List all plaintiffs (if you had co-plaintiff), including any aliases: ACE

D. List all defendants: COUNTY OF COOK, Illinois, and THOMAS DART

E. Court in which the Lawsuit was filed (if federal court, name the district; if state court, name the county):
UNITED STATE DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS

F. ~~_____~~
 Name of judge to whom case was assigned: The Honorable Judge MATTHEW J. KENNELLY

G. Basic claim made: _____

H. Disposition of this case (for example: was the case dismissed? was it appealed? Is it still pending?) (Pending)

I. Approximate date of disposition: _____

1. List all lawsuits you (and your co-plaintiffs, if any) have filed in any state or federal court (including the Central and Southern Districts of Illinois):

A. Name of case and docket number: COOK COUNTY, Illinois, THOMAS DART
ORC 0920

B. Approximate date of filing lawsuit: February 13, 2008

C. List all plaintiffs (if you had co-plaintiffs), including any aliases: ACE

D. List all defendants: COUNTY OF COOK, Illinois, THOMAS DART,
SALVADOR GODINEZ, and CHESTER PLAXICO

E. Court in which the Lawsuit was filed (if federal court, name the district; if state court, name the county): U.S. STATE DISTRICT COURT For The Northern DISTRICT of Illinois

F. Name of judge to whom case was assigned The Honorable Matthew F. Kennedy

G. Basic claim made: _____

H. Disposition of this case (for example: Was the case dismissed? Was it appealed? Is it still pending?):

This case is still Pending.

I. Approximate date of disposition: _____

A. Name of case and docket number COUNTY OF COOK, Illinois THOMAS DART
Case #: ORC 2140

B. Approximate date of filing lawsuit: _____

C. List all plaintiffs (if you had co-plaintiffs), including any aliases: ACE

D. List all defendants: COUNTY OF COOK, Illinois THOMAS DART, SALVADOR GODINEZ
V. ALEXANDER, L. HOPPER, CARMELLA K. RICHARDSON, MARETTA C. LAKE, and
MS. JONES.

E. Court in which the Lawsuit was filed (if federal court, name the district; if state court, name the county):

F. Name of judge to whom case was assigned: The Honorable Matthew F. Kennedy

G. Basic claim made: _____

H. Disposition of this case (for example: Was the case dismissed? Was it appealed? Is it still pending?) (Pending)

I. Approximate date of disposition: _____

List All lawsuits you (and your co-plaintiffs, if any) have filed in any state or federal court (including the Central and Southern Districts of Illinois):

A. Name of case and docket number: Bobby LEE HARRISON v. COUNTY OF COOK, Illinois

B. Approximate date of filing lawsuit: _____

C. List all plaintiffs (if you had co-plaintiffs), including any aliases: ACE

D. List all defendants: COUNTY OF COOK, Illinois, THOMAS DART, SALVADOR GONÁLEZ, SCOTT KURTOVICH, NELSON VILLANUEVA, D. ANDREWS, and Sargent TAYLOR.

E. Court in which the Lawsuit was filed (if federal court, name the district; if state court, name the county): U.S. STATE DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS

F. Name of judge to whom case was assigned The Honorable Matthew F. Kennedy

G. Basic claim made _____

H. Disposition of this case (for example: was the case dismissed? was it appealed? Is it still pending?): This case is still pending.

I. Approximate date of disposition: _____

A. Name of case and docket number _____

B. Approximate date of filing lawsuit: _____

C. List all plaintiffs (if you had co-plaintiffs), including any aliases: _____

D. List all defendants: _____

E. Court in which the Lawsuit was filed (if federal court, name the district; if state court, name the county): _____

F. ~~_____~~
Name of judge to whom case was assigned: _____

G. Basic claim made _____

H. Disposition of this case (for example: was the case dismissed? was it appealed? Is it still pending?): _____

I. Approximate date of disposition: _____

Vision Impairment COUNT I.

Statement of Claim:

State here as briefly as possible the facts of your case. Describe how each defendant is involved, including names, date and places. Do not give any legal arguments or cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. (Use as much space as you need. Attach extra sheets if necessary.)

I was seen in CerMAK Health Services around May 2007. There, I spoke to a male ophthalmologist pertaining to my eye problem. I explained to the eye doctor that I was losing my eye sight rapidly, that my old bifocals only have one lens, and it seem like I might be going blind, and that I might have cataract. The doctor was rude and unprofessional and barely talks. He gave me an eye-examinations. I looked into a microscope and he asked me to read some letters off. He adjusting the microscope until I was able to read the letters. Then he moved me to another Microscope and motion for me to put my head against the Microscope and I look into it with both eyes. He pressed a button and the machine clicked, I assume it was the dilate test. Nevertheless, I had difficulty seeing after the test. I told the ophthalmologist I couldn't see clearly. He didn't say a word, just motioning for me to move back to the first Microscope. I look back into the microscope with one eye at a time. I was unable to see the letters clearly. I made the ophthalmologist aware of it. He did some adjusting and said how is that? I said I still can not see clearly. He did more adjusting and looked at me. I said I still can't see clearly. I spoke up again sir, do you think I might have cataract? The doctor didn't say a word. He fitted me for glasses and wrote out the prescription, and called the next person. / Around the end of July, 2007, the glasses was delivered to me in division 10 20 Teir. I went into my cell and tried the glasses on and determined that I barely can see out of them. The next day I told the nurse about I couldn't see out of the glasses. She told me to submit a medical request form. I spoke to several more nurses and they did nothing about the problem. I submitted several medical request forms and no response. On August 11, 2007 I filed a grievance stating: Around ~~April~~ or May 2007 CerMAK ophthalmologist fitted me for bifocal glasses, and they was delivered to me around July 2007, I can not see out of them please reschedule me to see the ophthalmologist so my glasses can be corrected. ^{Social worker} ~~action~~ ^{said} ~~taken~~ Detainee has been advised not to use grievance forms for the purpose of submitting a request.

'Detainee further advised to write a CerMAK Health Services request form.

"Note." C.R.W. Verbally informed Division 10 Dispensary of detainee request.

Sign C.R.W. V. Butler, Date 8/15/07 AM. / Dept. 10

Around August 2007. I was seen in the division 10 dispensary. There, I spoke to Dr. Dunlap, I explained to her about the glasses I received in July 2007 that I couldn't see out of them. I requested to see CerMAK eye doctor to be refitted for glasses. Dr. Dunlap, said the County don't have an ophthalmologist any more due to the budget cuts, that I would need to get my family to bring me in a pair of glasses. I told her, all of my people is from the State of Georgia. She said there's nothing she could do about it. / I was seen in the division 10 dispensary in October 2007. There I spoke to doctor Dunlap, about my health problem, and about scheduling me to see the eye doctor to be refitted for glasses, and requests was denied. / In November 2007 I was seen in the division 10 dispensary on several occasions. She denied me medical treatment on almost every occasions. Her favor saying is you have costed the County over 20,000 dollars in medical, that you have seen every specialist in the Cook County Jail. I spoke to her again in division 10 on November 26, 2007. I explained to her about I could^{n't} see out of my glasses. I helded my old pair glasses up which only have one lens. I said this is the only thing that I have to see out. She said too bad you had costed the County too much money already (# 2008X0265).

Nov. 15, 2007 I filed a grievance Control #; Request. It stated, I was pre-scribed glasses at CerMAK around 4 month ago, that I can not see out of them. I filled out several medical request forms, no response. May I see a eye doctor for this problem. Response states; C.R.W spoke w/ CerMAK Health Staff. Detainee should request to see the division doctor, and request that the doctor give him a consideration for the eye doctor, sign Ms. V. Butler 11/23/07

I filed a grievance against Dr Dunlap on 1/11/08. 2008X0021 it states, Be advised this is an emergency I can hardly see. I was seen in CerMax Health Services around May 2007. There I spoke to a ophthalmologist, he gave me an eye examinations and fitted me with bifoual. The glasses was delivered to me around August 2007 in the division 10 2-A. I tried the glasses on and determined that I barely can see out of them. I have exhausted all available administrative remedies to get medical attention to see a eye doctor. First I've made the nurses aware of this issue, I submitted several medical request forms, I submitted several grievance & appeals forms, and I spoke to Dr. Dunlap, on several occasions in the division 10 dispensary between octomber & November 2007. I told her I barely can see out of my recent glasses that the ophthalmologist prescribed for me. She said there nothing she can do for me. I said yes you can to, re-schedule me to see the ophthalmologist? she said you have already costed the County over 20,000 dollars. I showed her my old pair of bifoucal which only have one lens, that this is the only thing I have to see out of. She said too bad, you're learn to take care of them the next time. When my Lawyer Ms. Marta Shade Harris, visited me around a month ago. I told her about my eye conditions, that the County deprived me of glasses, and how I was treated by Dr. Dunlap. I showed my Lawyers the one eye bifoucal glasses, that I have difficulty doing my legal works. I asked my Lawyer will she bring me a pair of reading glasses 2.75 strength to the County Jail and give them to my Social Ms. Butler, and she will give them to me, because I have already talked to her about the glasses. Or Mail them through the mail to Mr. Butler, ~~my~~ Lawyer agreed to Mail the glasses to Ms. Butler. I spoke to My Socialwork Ms. Butler, on numerous of occasions about the glasses my lawyer said she had mailed to Ms Butler. Ms Butler, told me that she never received the glasses, and that she didn't know what happen to them.

The first letter my Lawyer wrote on November 20, 2007 It states:

I represent Mr. Bobbie Lee Harrison, an inmate at the Cook County Jail, who indicated that you would be able to deliver the enclosed plastic framed reading glasses (+2.75) to him directly. If you are unable to assist us, please call me at the number above let me know how to send the glasses to Mr. Harrison. Thank you for your assistance. Sincerely, Marla Shade Harris.

I called my Lawyer in December, 2007 I told her that I had not receive the glasses, that I talked to Ms. Butler, and she said that she never received any glasses through the mail.

My Lawyer wrote a second letter on December 17, 2007 it states: Dear Mr. Harrison On November 20, 2007, per your request, we sent +2.75 strength reading glasses with plastic frames to Social Worker Butler of Division 10 and requested that she provide them to you. However, as of December 13, 2007, Social Worker Butler still had not received them and they have not been returned to me.

I called Ms. Butler on December 13, 2007 and she advised me to call her Supervisor, John Mueller, of Program Services to find out how to get the glasses to you. I called Mr. Mueller and he said contrary to Ms. Butler's suggestion, inmates are not entitled to reading glasses and we cannot send them to you or drop them off to Ms. Butler, so that she may give them to you. I also told Mr. Mueller that you were aware of other inmates who had received their reading glasses through the social worker, to which he responded, "I hear it all." According to Mr. Mueller, inmates are only allowed prescription glasses when they are prescribed by the jail ophthalmologist (eye doctor). Thus, in order to obtain jail-approved reading glasses, you must make an appointment with the eye doctor and get a written prescription from the eye doctor. Unfortunately, we cannot send them to you.

The grievance I filed on 1/1/08 Control # 2008X0021 states: Be advised, this is an emergency I can not hardly see, that I had exhausted all available administrative remedies to obtain some glasses. Around 2 weeks later I was seen in the division 10 dispensary.

There, I spoke to a nother doctor other than Dr. Dunlap. I explained my eye-conditions, and he said he would make me an appointment to see the ophthalmologist. I was seen in divison 10 dispensary around February 4, 2008. There I spoke to Dr. Dunlap, she checked the computer, I assumed she determined that the other doctor had scheduled me to see the ophthalmologist. Ms. Dunlap said I told you that you wasn't going to ^{get} a nother pair of glasses that she going to canceled the appointment.

On January 29, 2008 Honorable Judge Kennelly, held a Settlement Conference hearing at the Cook County Corrections located at 2600 S. California Ave. Chicago, Illinois. The attorney on both side and I was presence at the hearing Title BOBBY LEE HARRISON V. COUNTY OF COOK, ILLINOIS and THOMAS DART. The case pertaining to my (Shoulder injury - Prostate gland - food conditions, and double hernias) During the Conference I made the parties aware of my Criminal Status that I was prose, in my Criminal case, and don't have an adequate pair of glasses to see with, that I wear bifoucal, and my old bifoucal only have one lens, which have resulted into me going blind, that around May 2007 I was fitted for bifoucal by CerMAK eye doctor and around July 2007 the glasses was delivered to me in divison 10 2 c Teir. I determined I could bearly see out of them, that I made the nursing staff aware that I couldn't see out of the glasses. I exhaustion all available remedies trying to obtain a pair of glasses. Dispite that Dr. Dunlap, denied me glasses. My Attorney thought it would be an good idea to request a pair of glasses before making an settlement on Case 07C-0300. The State Attorney referral me to divison 10 dispensary. There I spoke to Dr. Dunlap, she denied me glasses and any other further medical treatment and told me to leave her office. Case 07C-0300 probably had an difference outcome if Dr. Dunlap wouldn't have denied me medical attention, and eye glasses.

Around December 2007, as I recalled, but not certain about the date. However, it been documents, I was called to Division 10 Barber Shop, where some official business was being conducted. When I arrived; The area was full of detainees, and there was an investigator who was discussing matters that pertained to written Grievances. He questioned each individual regarding their Complaints against the Staff, being the medical officials of Cermak Hospital and the division 10 dispensary. I spoke to the Investigator Jhon doe. He had all the Complaints I've written against Dr. Dunlap. He said I'm investigating all detainees who have written grievances against the medical Staff. I've explained to him how I'm being treating by doctor Dunlap, and why I written grievances on her. He took my reports, and said Doctor Dunlap, have a lot of Complaints against her, that he was checking into the matter and if any other grievances is file against Dr. Dunlap, will be forwarded to him. I told the investigator that Dr. Dunlap, is rude, unprofessional and insane, that the majority of the detainees dislike her because of her bad behavior, that on many occasions when I was called to the division 10 dispensary I'd witness to detainees refused medical attention if they wasn't allowed to see another doctor other than Dr. Dunlap, that not to take my word, but to go around to all of the fairs in division 10 and questioning detainees who had come in contact with her about her character.

Around April 1, 2008 I spoke to my psychiatrist doctor Mr. Menize, I told him I was experiencing depression, and it had gotten woser, that I was prose in my criminal case and I was unable to see proper, that around May 2007 Cermak Eye doctor prescribed me a pair bifocals and I can't see out of them, that for around (9) nine months I'd been trying to get Dr. Dunlap to reschedule me to see Cermak eye doctor to be refitted for bifocals, that on each occasions she denied, that I am force to wears my old bifocals with only one lens causing me to strained my eye, that on some occasions I borrowed other detainees glasses which had resulted into me losing my I sights, causing depression, psychosis, and bipolar behavior I went on to say that around (5) five occasions, I brought this issue before my Criminal Judge Ms/Mrs. Simmons,

And on (2) two of those occasions she issue a Courtorder for the County to provide me with prescription glasses. (The Courtorders). The first Courtorder states: It is the order of this Honorable Court that defendant be take to see the eye doctor at Cermak Hospital while housed in the custody of the Cook County Department of Corrections SA that the defendant can receive a new pair of prescription eye glasses. Issued On February 25, 2008. Signed Judge Simmons. The second Courtorder was issued On April 8, 2008. is states: This Court, having jurisdiction over the above Captioned matter, hereby orders that Cermak Hospital shall provide the defendant with an eye examination and corrective lenses as neededs to address his report of failing eye sight. Signed Judge Mächelle M. Simmons.

Before I left the division 10 dispensary on April 1, 2008 I asked Mr. Menize would he talk to Dr. Dunlap, about sending me to Cermak Health Services to be fitted for glasses. He said OK I'll talk to her. As of May 14, 2008 I have not received a pair of glasses. Eye glasses is an important element to me. Failed to provide me with adequate prescription eye glasses is an dangerous to my health which has resulted into deteriorating vision, chronic headache, and impairment of my daily activities. I am a prose litigant in my Civil and Criminal Cases this disability has deprived me of adequate research and preparing legal documents for my defenses.

COUNT II. Denied Dental Care

In September 2007 I complained to the nursing staff about my bleeding gums and a toothache. I asked nurse _____ to put me down to see a dentist? He told me to put in a medical request form. I submitted several medical request forms in September 2007. Around 2 weeks later I was seen in the Division 10 dispensary. There I spoke to Dr. Dunlap. I explained to her about my toothache, and bleeding gums. Dr. Dunlap said the County doesn't have a Dentist due to the budget cut. I told her I was in serious pain and requested to go outside the institution to see a Dentist? She said that would have to be arranging by CerMax Medical Director and the Security Staff, and if it is arranging I would be notified. I was never notified by the Staff, nor was I calling back to the Division 10 Dispensary for that reason.

On January 16, 2008 I filed a grievance it states: is pertaining to a dental problem: This is an emergency I am experiencing a severe pain from a toothache in the rear, and bleeding gums for months I've made this problem aware through the medical staff and through the medical request forms, no response. Mr. Brian Buchanan, looked into my mouth, he said it look like my gums is infected. May, I please see a dentist, I have difficulty sleeping at nights.

On January 30, 2008 I appeal it, the appeal states: I am appealing this because it is an emergency I can hardly eat my gums is infected, please get me to a dentist, thank you. The response states: C.H.S. Admin. Detainee is scheduled to be seen by a dentist on February 11, 2008.

Around the middle of February 2008 I was sent to the division five dispensary. There I spoke to a dentist Thom doe _____ he checked my mouth and said seem like the infection had gone away. I said Yeah, it went away before, but it came back. He said if it comes back again put in another medical request form, that I may be able to save my tooth.

I asked the dentist why do he think my gums bleed all the times. he looked into my ^{mouth} again and said the bleeding probably comes from all the build up on my teeth. I asked him could the bleeding causing gums disease? He said it a possibility. I asked him would he make me an appoint^{ment} to get my teeth clean to prevent gums disease? He said the County don't clean teeth anymore.

On March 10, 08 I filed a grievance 2008X0486 it states: This grievance is pertaining to dental care. I ~~went to the~~ ^{saw a dentist} around a month ago for a tooth problem, infection, and bleeding gums. The dentist said I have build-up on my teeth that why my gums are bleeding. I asked him about making me an appointment to get my teeth clean? He said the County don't clean teeth. My gums consistently bleeding, even when I'm not eating. Bleeding gums can resulted into gums disease. My gums has been bleeding for over a year now. The County took our long tooth brush around February 2007 and issued us a short tooth brush around 2 inches long which make it difficult to clean our teeth properly. I am awarded ~~ed~~ to the state while incarceration in the Cook County Jail. It's the County job to provide the detainees with hyginical care. (Action you are requesting). Denial dentist care violated the Fourteenth Amendment rights, please, can I get my teeth clean?

March 20, 2008 I appeal it states: I am concern about my bleeding gums I need my teeth clean. I have not been call back to the dentist, my teeth consistently bleeding, please. Can I get my teeth clean. April 8, 2008 the response states: C.H.S. Admin, dentist at CCJOC no longer does teeth cleaning.

On 5/1/08 I was seen in the division 10 dispensary. There, I spoke to Dr Dunlap, I told her I saw the dentist, he said the infection have went down, and that he denied teeth cleaning. and my teeth have resulted into gingivitis. Dr. Dunlap, looking into my mouth and said you do have a lot of decays ^{on} your teeth and she prescribed me a mouthwash called (Chlorhexidine Gluconate 0.12% oral rinse). I received on May 7 2008. No resulted. ~~14~~ ^{as} of today May 14, 2008 No improvement, or teeth ^{clean}

COUNT III.

Around July 2006 I was seen in the division 11 dispensary. There I spoke to Dr. Baker. I explained to the doctor I noticed blood in my stool. Dr. Baker, said he would scheduling me to go to CerMak Health Services to get an lower G.I. Test to see what the problem is. Around August 2006 I was called to CerMak Health Services and the appointment was Cancel. In September 2006 I was transferred to division one (1) 2 G Medical Unit. There I submitted several medical request forms about getting a lower G.I. test. Around November 2006 I was seen at CerMak Health Services. There I spoke to a female urologist about a prostate gland problem, at the same time I explained to the urologist about the blood in my stool. She suggested that I get an lower G.I. test and scheduled to see a CerMak doctor. On December 19, 2006 I was seen in CerMak Health Services, There I spoke to a doctor Jhon doe, the head nurse Ms. Jackie. They gave me a lower G.I. and determined that I was suffered from type of Colon disease that resulted into bleeding, I don't recall the name. The doctor prescribed me a medicine called Sulfasalazine G 500 to take two (2) pills in the morning and two (2) pills in the evening on the daily basic. The doctor said he would called me back in around four (4) months for a check-up. I was never call back for a check up.

Around August 2007 I saw nurse Jackie. I asked her why was I not called back to CerMak for a check-up? She said the doctor who gave me the lower G.I. test had retired and that CerMak Health Services doesn't have anyone anymore to give G.I. test.

Between August & September 2007 I submitted several medical request forms requested to get an lower G.I. test pertaining to my Colon problem. In September 2007 I was called to the division 10 dispensary. There I spoke to Dr. Dunlap. I explained to her about my Colon condition and the delay in getting a test. She said the doctor who used to give G.I. test at CerMak, is no longer there. October 2007

I was seen in the division 10 dispensary. There I spoke to Dr. Dunlap. I explained to her about blood~~ing~~ being in my stool. She said you had costed the County too much money already that I had seen every specialist in the building that she will see about making me an appointment to go to Provident Hospital to get an lower G.I. Test.

In November 2007 I was seen again in the division 10 dispensary. There I spoke to Dr. Dunlap. I told ^{her} that I have not been called to Provident Hospital for the G.I. test. She checked the Computer, and said you have costed the County over 20,000 dollars, and she asked me when am I getting out of Jail? I told her I didn't know when I was getting ~~out~~ of jail. She called someone ^{on} the phone, after she hung up the phone she said you should be going soon. I was seen in division 10 dispensary in December 2007, There I spoke to Dr. Dunlap, I told her I had not been called to Provident hospital for the G.I. She checked the Computer and said you're be called soon.

The first week in January 2008 I was seen at Provident hospital. There I spoke to a lady behind the counter. She said the doctor was not in, that she would scheduled me for the following week. I was never called back to Provident for the G.I. test.

In february 2008 I was seen again in the division 10 dispensary. There I spoke to Dr. Dunlap. I told Dr. Dunlap, I was called to Provident hospital around 2 weeks ago, but the doctor wasn't there. She was very rude she said there's nothing wrong with you, that I'm going to discontinue the Sulfasalazine and Cancel the appointment.

Around february 2008 I was seen again in the Division 10 dispensary there I spoke to Dr. Dunlap, I told her I noticed blood in my stool, she said there's nothing wrong with you and asked me to lie on the ~~bed~~ and pull my pants down. She performed some type of Surap test on me.

Around March 2008 I was seen in division 10 dispensary. There I spoke to Dr Dunlap I explained to her that I was experiencing stomach cramps and her to make me an appointment for Provident Hospital to get my stomach checked out? She said she did make me an appointment for Provident, but Provident don't see detainees any more, that she would schedule me to go to Stroger Hospital, that I will be going soon. I was never seen. On March 30, 2008 I filed a grievance it states: I noticed blood in my stool on several occasions this month, that I need to get an Lower G.I. test to see what going on in the inside of me. However, the last Lower G.I test I had is around a year and a half ago that in January 2008 I was seen at Provident Hospital to get an Lower G.I. but the doctor was not there, and I was rescheduled for the following week, but was never call back. (Summary of request states:) Detainee request to get a Lower G.I (Colon Check test). Action taken: Scheduled on 4/17/08. Since then the appointment been cancel twice.

Dened Medical Attention and Diet.

COUNT IV

from November 2007 through January, February March, April & May 2008 in division 10 dispensary I spoke to Dr. Dunlap on numerous occasion pertaining to medical issue and about a diet. On several occasions I told Mrs. Dunlap, I was having stomach pain, and experiencing diarrhea stooling up to 3 to 5 times everyday which had resulted into me losing weight. On one occasion she asked me when was the last time I had an Aids test? I told her that I had a Aids test around 2003. She said I am going to make you an appointment to get an Aids test. Around a few weeks later I was seen at Cermak Health Services and took the test. Around December 2007 I saw Cermak urologist, she said the Aids test came back negative. I seen Dr. Dunlap, in division 10 dispensary on another occasion between the above dates. I showed her the infected rash on both of my legs. I told her I had this same rash in 2005 and that division 11 dispensary Dr. Baker prescribed me an ointment, and it didn't work. I filed several medical request slips around 3 to 4 months later I was sent to Cermak Hospital. There I spoke to a female Dermatologist she performed an injection on both legs of the infected areas, around a month later the infection was gone away. However, around 2007 the infected rash returned again on both legs of the same areas. Dr. Dunlap, checked her computer, she said I see here where you have a liver disfunction, that you could have a stomach ^{virus} sometime cause an outer reaction, which is good on good possibility why the infected rash returned to the same areas. Around February 2008 ~~Dr. Dunlap~~ Dr. Dunlap made me an appointment to see Cermak Dermatologist. She went on to say I'll set you an appointment outside of the County to get a lower G.I test for you colon ~~on liver~~. In March 2008 I saw Cermak Skin Specialist, and he prescribed me an ointment called Hydrophilis ointment & fongera Clabetasol propionate ointment us up to 05%. I told the doctor that I was prescribed this medicine before and it didn't work, that the Dermatologist end up performed an injection on my legs to get rid of the rash. He said Cermak doesn't do the injection any more, that he would call me back in 2 months to see the results and if the ointment don't work, that he would send me outside to see a specialist. As of today 5/18/08 I have not seen any improvement, nor have I been back to Cermak Hospital, or outside to get a lower G.I test. Both outside appointment was canceled.

Between November 2007 through April 2008 I spoke to Dr. Dunlap on numerous occasions about changing my high protein diet to an Renal diet that I was allergic to the high protein diet, that I believe the high protein diet was causing me stomach cramps, diarrhea and make me stool 3 to 5 times a day. Dr. Dunlap, said you had costed the County over \$20,000, that she wasn't going to prescribe me any thing that the only way you can get the Renal diet is if you have kidney problem. I said I have prostate gland, colon, and liver disfunctions that I should be entitle to the Renal diet when the high protein diet causing my body to deteriorating, that when I have commissary I eat it and my bowelment usually work proper, that I can't afford to eat commissary every day that my monthly average is around (40) dollars. She said too bad I'm not going to prescribe the Renal meal for you.

The High Protein Diet consist of Breakfast, Lunch, dinner and a night snack. Breakfast usually consist of one (1) half pint fat free SKIM MILK, one (1) fruit drink, two (2) 2 breads, one jelly, usually oatmeal or grit, Chack balongna. Lunch usually consist of two (2) balongna Sandwich or ham Sandwich, one (1) snack cookie, snack peanut, and one (1) half pint fat free Milk. Dinner usually consist of for four (4) days some type of miscellaneous food items that one grinded up together, Chicken processed one (1) day, hot dogs one (1) day, and soybean burger or miss miscellaneous with noodles. my opinion this food don't have enough nutrition, and disagreed with me which causing side effects.

Around April 1, 2008 I spoke to my psychiatrist doctor Mr. Menize, I told him I was experiencing depression, that it had gotten worse, that I don't have too much an appetite any more, that the high protein diet disagreed with me causing diarrhea which had resulted into me losing weights that on numerous occasions I've asked Dr. Dunlap to exchanged my high protein to an Renal diet, and she denied my request on each occasion.

I told him that the lunch balanga, and the dinner meats causing stomach tramps and diarrhea that around January 2008 I spoke to Dr. Dunlap in division 10 dispensary. She said I had already costed the County too much money, and denied my diet and any follow up treatment. I also spoke to a Chinese doctor Thon dee around January 2008 I explained to him about my ^{symptom} ~~symptom~~ that the high protein diet disagreed. He asked me what kind diet would I like? I requested the Renal diet and he prescribed it to me, but I never did received the diet. Around February 2007 I spoke to Dr. Dunlap, in the division 10 dispensary. I told her that the Chinese doctor prescribed the Renal diet for me but I never did received it. She checked her Computer, and said the Renal diet was never prescribed to you. that the only way you can get the Renal diet is if you have a Kidney problem. I told Mr. Menize, that I told Dr. Dunlap, I have a Colon, Liver, and prostate gland problem that I should be intitle to the Renal diet when the high protein diet disagreed with me. that Dr. Dunlap said too bad that you had already Costed the County too much money already, denied the diet. I told Dr. Menize, upon information and belief that Dr. Dunlap, Cancel the Renal diet that the Chinese doctor prescribed for me. I ~~asked~~ ^{asked him} Could he prescribed the Renal diet for me. He said he have nothing to do with the food that he can exchanged my medications from taradone to Daxipin and proZac to 9/3 which is the number of the pill, I'm not certain about the name. Anyway, Mr. Menize said this should increased my appetite. I agreed and Mr. Menize exchanged the medications. The 9/3 disagreed with causing headache and dizziness. I told the nurse Ms Tape a few days later, that the medicine Mr Menize, exchanged with me disagreed with me causing me headache & dizziness. A few days later I was called back to the division 10 dispensary. There I spoke to Mr. Menize, I told him the 9/3 disagreed with me. He switch me back to prozac. I asked him did he talk to Dr. Dunlap about sending me to the eye doctor to be fitted for glasses, and about giving me the high protein diet? He said yeah I talk to her, that she said she will send ^{you} ~~me~~ to be fitted for glasses, but she denied the diet. As of today May 14, 2007 no glasses no G.I. test. and no diet.

On 5/5/08 I filed a grievance Control #: 2008 0901 it states:

I get the 3800 high protein Diet on the daily basis. I been getting this diet for around a year now. This diet disagreed with me causing sickness to the bottom of my stomach loss of appetite, stomach cramps and diarrhea, which causing me to stool 3 to 4 times a day which resulted into me losing weights and sleep. I suffered from a Virus of Illnesses Mental and physical disorders prostate gland, Colon, and Liver disfunction. For the last ten(10) months I been trying to get my diet exchanged to a Renal diet I spoke to Dr. Dunlap, in the division ten(10) dispensary on numerous occasions, She denied my request on each occasion. Dr. Maniza, said he talks to Mrs. Dunlap about exchanging my diet to a Renal diet she denied it. I am allergic to the high protein diet the lunch balanga meats and the dinner Meats Dr. Dunlap, said the only way that I can get the Renal diet is if I have a kidney problem. Why am I force to eat this high protein diet when it caused side effects and deteriorated of the body. please Can I get my diet exchanged, thank you for your time and for considering this Matter. (Action you are requesting). To get a Renal diet to reserved my health, CaTouRe, Ann Dunlap.

On 5/17/08 I filed a grievance it states: Around 2005 I was seen in division 11 dispensary there I spoke to Dr. Baker. I showed Mr. Baker, an infection rash areas on my legs. He prescribed me an ointment to use 2 to 3 times a day, the ointment didn't work. Around 3 months later I was sent to Cermak Health Services. There, I spoke to a female skin specialist she performed an injection on both legs, around a month later the rash was gone. However around 2007 the infected rash returned in the same exact areas on both legs. Around October 2007 through May 2008 I was seen in division 10 dispensary on numerous occasions. There I spoke to Dr. Dunlap. I showed her the infected rash and explained to her around 2005 I was treated for the rash that Cermak skin specialist had to give me an injected in both of my legs to get rid of the rash. Dr. Dunlap, said it could be something going on inside of me. She scheduled me to see in Cermak skin specialist around February 2008. I saw the specialist a few weeks later.

The skin specialist said Cermak Health Services doesn't have the injection any more, that he would call me back in around 2 months to see the results and if the ointment don't work, that he will send me outside the jail to see a skin-specialist. As of today 5/18/08 the infected rash is still on both legs and I have not been called back to Cermak for my check-up, nor have I been schedule to see an outside specialist for my skin problems. This is my second grievances on this issue, the last one was not returned to me, filed around September 2007.

Exposed to Hepatitis & Tuberculosis

And Other Venereal Disease. COUNT IV

I May have been exposed to hepatitis, Tuberculosis and other Venereal Common disease within the last 2 years due to the County's negligence and deprivation of a Basic human need. Upon information and belief Hepatitis C and Tuberculosis and other Venereal disease is very common in prison and jails is usually transmitted by Tattoo, infected blood, sharing needles, contaminated razors, and urine, bacteria, or Human feces. About every week on one occasion or another the officers have passed out used razors. On numerous occasions I held^{ed} the razor up to the light and determined facial hairs was in the razor. I usually make the officers aware of the dirty razors, and on several occasions I've filed grievances & appeals. For example, on 12/20/06 I filed a grievance on dirty razors it states: We detainees are concerned about the use of used razors, that are being passed out in division 1 2 G Teir by the third shift officers. On last Wednesday (12/13/06) officer Tuzin passed out the used razors. Some of the detainees reminded him that the razors were used. Mr Tuzin, looked at the razors, and said they do have hair in them that you all can give them back to me. Some detainees gave the used razors back to the officer and some detainees kept their razors. This is a life threatening situation, because you can catch all type of disease's from used razors. If the Supervisor bring the razors to the teir officers, well he is responsible for the mishap. (Action you are requesting) please do not pass out used razors anymore. (Control #. 2006X1500).

On several occasions I was forced to walk in other people blood. Usually when gang fights occurred on a fair blood is usually left on the floor and walls. I have filed several grievances on these issues. I never receive a proper response through the administration. few of the Complaints were addressed by appeal and others were processed as a request. Some of my original Complaints were confiscated during a shake-down. For example, On June 24, 2007 I filed a grievance. On this issue, it states: An incident happened in Division 1 2 & 3 resulted into an confrontation between the detainees, which left blood all over the hallway and day room areas (10-10) was called Superintendent Salazar, Sergeant Taylor, and other officials was called to the scene. Sergeant Taylor, conducted the strip search, and Superintendent conducted the investigation. Sergeant Taylor, order the detainees to strip naked twice and redressed themselves and to pick up their shoes and walk through the blood bare foot back to their cells. I got blood on my foot on the way back to the cell. The officials denied the detainees cleaning gear to clean up the blood. The blood remained on the floor for over 30 hours. Inmates, insects, and mice, tracked through the blood and officials as well. The County had failed to clean up the contaminated blood and failure to regularly provide the detainees with protective gear to help clean up the contaminated blood. I am concerned about our health and safety. (Action you are requesting) to go ^{to} Cermak Health Services to get a check-up to make sure I didn't catch anything from the infected blood, and that Sergeant Taylor, and Superintendent Salazar to be place on restriction for their previous conduct. As of today May 14, 2008 I have not been scheduled for any medical examinations, which would be referred as blood test for any illness that may still be presently lying dormant in my immune system.

The Cook County officials had acted with deliberate indifference for not provided me with adequate medical treatment. These officials have disregarded the risk to my health and safety by acted with deliberate indifference. They knew about the on going risks, but failed to take adequate measure to protected my health and safety. There had been other occasions where I came in contact with other people blood, and I was denied medical attention.

On 1/15/08 I came in contact with contaminated dairy product where my Cellmate Mr. Adent, got blood on my milks. However, there were prior incident where I could have come in contact with Mr. Adent blood. I'm not certain but it's a possibility my Cellmate planted the blood on my milks. The reason I say this is because the blood was around the rim of the milks where the arrow says ^{to open} I said what a close incident for the blood to be around the mouth of the milks, like it was planted there by someone. He said yeah, that is something to think about, that it may be someone in the kitchen tampering with the food, and if that is the case we're in big trouble. I made the tour officer Mr. Shaw aware of the incident. My ^{cellmate} tried to make me believe that the milks came with blood on it. For the records Mr. Adent, have opened bleeding sores all over his body, especially his face and lips, and he constantly picking at them. On a couple occasions he told me that he used to have T.B. that he went from weighting 260 pounds to around a 150 pounds, and that he never finished taking all of his medicine. Prior to the milks incident I've let Mr. Adent borrowed my legal book. On 1/16/08 I asked Mr. Adent for my legal book back to do some researching. He handed the legal book to me title protecting your Health and Safety as I was turning through the book I noticed blood stain all through the book. I said Mr. Adent, you have tracked blood all through my book, that it got to be your blood on the milks. He admitted that it must be his blood that he must have gotten the blood on the milks when he moved them out of the windows prior to going to the recreation. I said I noticed that you always moved the milks from out of the window whenever we go to the recreation, that it a good possibility that I been exposed to your blood. He said, I don't have any disease. I said you told me that you used to have T.B., and that you didn't take all of your medicine. He said I'm OK. I said man you don't know that, and I'm facing a risk of contracting any disease that you may have, that I'm going to see can I get a blood test and to see can I get you moved to another cell.

Around 1/17/08 I asked officer Tapia, about moving this guy out of the cell or moving me to a nother cell? Officer Tapia^{said} I have to check with the Sargeant about Cell-exchange. I spoke to Sargeant the next day about the incident and requested to be move, and he denied it. I spoke to officer Shaw on several occasions about moved this guy out of Cell 23. Office Shaw, said he would talk to the Supervisor about moving this guy out of the cell. On 1-16-08 I spoke to Sargeant^{Lewis}, and Lieutenant Pages about what happened. Sargeant Lewis, said this is a serious matter, and he called for lieutenant pages. Lt. pages, said that is serious, that they will come by and talk to me later on that day on the tear. They never never addressed the issue. I put in several medical request forms, and filed several Complaint about the issue. A few day later I was called to division 10 dispensary. There I spoke to nurse Price, Nurse Price handed me a medical request form and said did you fill out this medical request? I looked at it, and said yes! I said I have been exposed to my Cell Mate blood and I would like to get a blood test to make sure I didn't catch any thing from him. She said where are Mr Robert Adent, I said he is on 2 c telr Cell(23). She said I'm going up there and talk with him. I said what about me getting a blood test? She said first let me talk with Mr. Adent. The next day I spoke to nurse Price again when she delivered the medicine to 2 c telr. I asked her did she make me an appointment to get a blood test? She said no, that I talk to Mr. Adent, and he said he don't have nothing. I said you can't go by what Mr Adent, says of course he going to say he don't have anything. She said like I said you can't get a blood test. I said did Mr. Adent tell you about he used to have T.B. She said no. I said it a good possibility that Mr. Adent, still have T.B. because he admitted that he went from 260 to 150. The first grievance I filed on this issue was on 1-15-08 I gave it to Social worker Morales, and he claim he lost it. The Second grievance I filed was on 2/13/08 it states: On 1-15-08 I had a couple of milks sitting in the window in my room #23. Detainee Buchanan, and I noticed that blood was on the top of

the milks on the part where is say, to open. I found out later that the blood came from my cellie Mr. Robert Adent. Mr. Adent, admitted that he must had gotten the blood on the milks. Earlier that morning prior to going to the recreation, that he moved the milks from out of the window, and placed them on the desk, and when he returned he placed them back in the window. I always keep milks sitting in the window to keep fresh. We usually have inside recreation around (3) days a week, and Mr. Adent, would always rotated the milks. Robert, suffered from a disease where he have open bleeding sores on his body, especially his face area, and lips would always be bleeding. Robert Adent, told me that he use to have T-B, and that he didn't take all of his medicine as required. It's a good possibility that I been exposed to this guy blood. Everything that he touched he leave blood behind. For example, he have tracked blood all through my Legal book, I spoke to nurse Price, nurse Tate, nurse Wilkey, and nurse Jones. I also spoke to officer Shaw, officer Tapia, Sergeant Lewis, and LT. Pages. On 1-16-08 LT. Pages said he would come to the tier and talk to me. No response. I filed a grievance on 1-15-08 and gave it to Socialworker Morales, when he came to the Tier Friday 2, 11-08 I saw Socialworker Morales, in his office, and I asked him what happened to the grievance I filed on the Contaminated blood? He said I don't know that I could refile it, which I did on 2-13-08. This is an emergency. I need to get a blood test to make sure that I haven't caught anything from this guy. I talked to numerous nursing staff and officers and they did nothing about moving me or giving me medical treatment. I also filed a grievance. Stated that it violated my Constitutional rights to have me in a cell with a conviction criminal. The grievance was not return to me. As of today May 14, 2007, I have not received an adequate response.

EXHAUSTED.

The plaintiff have written numerous of letters to difference organizations and Agencies seeking help and outlining the misconduct of the Cook County official. The plaintiff have also filed numerous of grievances and appeals through the administration grievance board, and outside the institution. The Defendants is aware of the plaintiff serious medical needs, but disregarded the serious risk to the plaintiff help. Therefore the plaintiff turned to the Court for help for these unconstitutional violations. Some of the plaintiff grievances was never returned by the social worker and some was taken as shake-down.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff Bobby Lee Harrison, respectfully requests that this Court award the following relief:

A. A declaratory judgment finding that Defendants' practice, policy, or custom of delaying and denying pretrial detainees access to adequate medical care has resulted in deliberate indifference to plaintiff's serious medical needs, that violated the 14th Amendment, that guaranteed by the plaintiff.

B. To provide the plaintiff with appropriate eye glasses for his poor eye condition. To provide the plaintiff with appropriate B.I test to determine his liver and colon conditions. After adequate evaluation to provide adequate medical treatment for his illness, and to provide the appropriate diet to help preserve his health, and to provide him with adequate injection for his rash.

C. An injunction requiring Defendants to provide him with the adequate medical treatment for all the above, but not limited to providing the plaintiff with adequate medicine on the daily basis, and to insure the above orders is carry out, and to provide the plaintiff with adequate dental care, and to provide adequate blood testing for disease.

(1) To Sue County of Cook, Illinois, THOMAS DART, CATOURE, ANN Dunlap, JOHN MUELLER, and JOHN DOE, in his and her individual and official capacities & (CHS)

(2) To find all the above defendants liable for damages for the inadequate medical treatment and deprivations that the plaintiff has suffered and continues to suffer, jointly and severally

(3) Compensatory damages in an amount in excess of \$200,000

(4) Punitive damages in an amount in excess of \$150,000

(5) Nominal damages in an amount in excess of \$1,000 Trial by Jury, Court Costs,

plaintiff, and any other additional relief, that the Court have to offer and lawyers costs.

VERIFICATION

I have read the foregoing complaint and hereby verify that the matter alleged therein are true, except as to matter alleged an information and belief and as to those I believe them to be true. Certify under penalty of perjury that the foregoing is true and correct.

Signature Bobby L Harrison

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